



JOHN ENGLER, Governor

**DEPARTMENT OF ENVIRONMENTAL QUALITY**

*"Better Service for a Better Environment"*

HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET: [www.deq.state.mi.us](http://www.deq.state.mi.us)

**RUSSELL J. HARDING**, Director

REPLY TO:

STORAGE TANK DIVISION  
TOWN CENTER  
PO BOX 30157  
LANSING MI 48909-7657

October 1, 1999

TO: Owners, Operators, and Interested Parties

FROM: Roger Przybysz, Chief, Storage Tank Division

SUBJECT: Report on the Substandard Tank Initiative

This is to provide owners and operators of regulated underground storage tanks (USTs) the results of the enforcement initiative targeting substandard tanks not in compliance with the December 22, 1998 UST upgrade requirements. Owners and operators of UST systems now need to focus on the continuing challenge to prevent leaks by ensuring that UST systems continue to be safe and are managed properly.

**Background**

Federal and state regulations required owners/operators of substandard USTs to close, replace or upgrade the substandard USTs by December 22, 1998. The upgrading requirements included corrosion protection for tanks and piping, overfill prevention, and spill protection. The Storage Tank Division (STD) conducted an outreach effort during May, June, and July 1997 to advise owners/operators of the December 22, 1998 deadline. The STD inspectors provided information and answered questions on the 1998 requirements. Approximately 2,300 facilities were visited during this initiative.

Inspections were also conducted from December 1, 1997, to June 1, 1998, at all substandard facilities that were not previously inspected to identify potential violations of the 1998 requirements. A total of 1,629 inspections were conducted.

**1998 Initiative**

On January 4, 1999, STD staff began the enforcement initiative to inspect all facilities that had not upgraded their UST systems. By July 30, 1999, these inspections were completed. Any UST system found to be noncompliant with the upgrade requirements was red-tagged to prevent delivery of product. During this initiative, 3,388 facilities were inspected, with 1,313 facilities having one or more USTs red-tagged. Subsequently, 285 facilities were de-tagged because the UST system was upgraded or removed. Of the facilities red-tagged, 55 percent were nonmarketers and 45 percent were marketers of petroleum products. The inspections also revealed that 33 percent of the facilities inspected had failed to notify the STD, by use of an amended registration form, that they had upgraded or closed their UST systems.

**DIRECTION FOR 2000 AND BEYOND:****Operation and Maintenance and Pollution Prevention**

With the passing of the 1998 deadline, it is easy for the owner/operator to think that the work is done. However, the focus now needs to shift to operation and maintenance of UST systems to prevent another generation of leaking USTs. Although the technology is now in place to minimize releases, it is not fail-safe. There still needs to be continued monitoring by the owner/operator to assure that the systems in place are functional and that early warning devices are operational to prevent any future release. With the upgraded systems, the probability of releases can be minimized by making sure that:

- The overfill prevention feature remains operational.
- The spill protection catchment basin is liquid tight and emptied.
- Corrosion protection is maintained and functional.
- Release detection is monitored.
- If the tank is lining, the lining is inspected according to the regulations.

Finally, the Storage Tank Division greatly appreciates the concerted efforts of all the owners and operators, and the petroleum associations who have worked so diligently to comply with the upgrade requirements for underground storage tanks. These efforts have resulted in greater protection of the public health and the environment. You have made significant progress and can be proud of your accomplishments. By continuing to work together, we will ensure that preventing releases from underground storage tanks is a common business practice.

Please contact the Hazardous Materials Storage Inspector serving your area for further assistance in maintaining compliance with Part 211, Underground Storage Tank Regulations, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Below is a list of STD district offices and telephone numbers.

<b><u>CADILLAC OFFICE</u></b>  120 W CHAPIN ST CADILLAC MI 49601-2158  231-775-3960 (PHONE) 231-775-1511 (FAX)	<b><u>DETROIT OFFICE</u></b>  300 RIVERPLACE, SUITE 3600 DETROIT MI 48207  313-392-6480 (PHONE) 313-392-6488 (FAX)	<b><u>PLAINWELL OFFICE</u></b>  1342 SR-89 WEST, SUITE B PLAINWELL MI 49080-1915  616-692-2120 (PHONE) 616-692-3050 (FAX)
<b><u>GAYLORD OFFICE</u></b>  1732 W M-32, PO BOX 667 GAYLORD MI 49735-0667  517-731-4920 (PHONE) 517-731-6181 (FAX)	<b><u>JACKSON OFFICE</u></b>  301 E LOUIS GLICK HIGHWAY JACKSON MI 49201-1556  517-780-7690 (PHONE) 517-780-7855 (FAX)	<b><u>SAGINAW-BAY OFFICE</u></b>  503 N EUCLID AVE SUITE 1 BAY CITY MI 48706-2965  517-686-8025 (PHONE) 517-684-9799 (FAX)
<b><u>GRAND RAPIDS OFFICE</u></b>  350 OTTAWA ST NW 6TH FLOOR GRAND RAPIDS MI 49503-2341  616-356-0500 (PHONE) 616-356-0202 (FAX)	<b><u>MARQUETTE OFFICE</u></b>  1990 US 41 SOUTH MARQUETTE MI 49855-9198  906-228-6561 (PHONE) 906-228-5245 (FAX)	<b><u>SHIAWASSEE OFFICE</u></b>  10650 BENNETT DR MORRICE MI 48857-9792  517-625-5515 (PHONE) 517-625-5000 (FAX)
<b><u>SE MICHIGAN OFFICE</u></b>  38980 SEVEN MILE RD LIVONIA MI 48152-1006  734-953-8905 (PHONE) 734-953-1544 (FAX)	<b>MAIN OFFICE</b>  333 S CAPITOL AVE PO BOX 30157 LANSING MI 48909-7657  517-373-8168 (PHONE) 517-335-2245 (FAX)	

